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**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF UTAH**

In re: LEE DANIEL LUECK XXX-XX-0786 CARLYN J LUECK XXX-XX-7108 Debtor(s).	: : : : :	Case No. 16-28218 Chapter 13 Judge Kevin R. Anderson
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MOTION TO MODIFY CHAPTER 13 PLAN

COME(S) NOW Debtor(s), Lee & Carlyn Lueck, by and through counsel, pursuant to 11 U.S.C. § 1323 move for an Order as follows:

1. Debtor(s) filed a Chapter 13 petition for relief on September 15, 2016.
2. The Debtor(s)' Chapter 13 Plan was filed with the Court on September 21, 2016.
3. The Debtor(s) seek(s) to alter paragraphs 1(b), 1(c), 6(a), 6(b) and 12(j) as follows:

Paragraph 1(b): Step Payments: Debtor(s) shall pay **\$1,700** starting 10/2016 for **4** months to the Chapter 13 Trustee with payments changing thereafter to **\$1,800** starting 02/2017 for **7** months to the Chapter 13 Trustee with payments changing thereafter to **\$1,886** starting 09/2017 for **12** months to the Chapter 13 Trustee with payments changing thereafter to **\$1,997** starting 9/2018 until completion of the Plan. All of such payments are due on the 25th day of each month.

Explanation of Step Payments: Stepped Plan Payments occur due to the following:
Step Payment increase-month 12 (09/2017): Debtor's 401K Loan pays off.
Step Payment increase-month 24 (09/2018): Debtors 401K Loan pays off.

Paragraph 1(c): Contribution of Tax Refunds: For the next three tax years of **2016, 2017** and **2018**, the Debtor(s) shall pay into the Plan yearly state and federal tax refunds that, when combined, exceed \$1,000 or \$2,000 if allowed under applicable law (see section 10).

Paragraph 6(a): Creditor: One Main Financial; Collateral: Pontiac Trans Am; Amount: \$9,962.66; Value: \$9,962.66; Rate: 15%; Accrual: Petition; AP: \$355.00; Months: 4; EMP: \$500.00.

Paragraph 12(j): Remove Mortgage Strip provision for Creditors: IRS and USTC

Paragraph 12(j): Remove Lien avoidance treatment for Creditor Pepperwood Homeowner's Association.

4. All other portions and provisions of the plan remain the same and unaffected.
5. The proposed modifications do not negatively impact any creditors.
6. As such, the Debtor(s) respectfully request(s) the Court to confirm the Chapter 13 Plan as modified herein and to grant Debtor(s) such other relief as the court shall deem just and proper.

Dated this 23rd day of January 2017.

_____/s/ Robert Tripp_____
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